



December 7th, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: **WC Docket No. 10-90, Connect America Fund; GN Docket No. 09-51, A National Broadband Plan for the Future; WC Docket No. 07-135, Establishing Just and Reasonable Rates for Local Exchange Service; WC Docket No. 05-337, High-Cost Universal Service Support; CC Docket No. 01-92, Developing a Unified Intercarrier Compensation Regime; CC Docket No. 96-45. Federal-State Joint Board on Universal Service; WC Docket No. 03-109, Lifeline and Link-up; WT Docket No. 10-208, Universal Service Reform – Mobility Fund**

Ex Parte Filing

Dear Ms. Dortch:

On December 4th, 2012, Jim and Luke Kail from the Small Company Coalition (SCC) and Doug Kitch with Alexicon Telecommunications Consulting (Alexicon) met separately with Christine Kurth, Policy Director & Wireline Counsel to Commissioner McDowell and Nicholas Degani, Wireline Legal Advisor to Commissioner Pai regarding the above-captioned dockets. We are submitting this *ex parte* filing pursuant to Section 1.1206(b) of the Commission's rules.

It was explained that the SCC continues to offer an alternative plan ("Plan") and model for complete Universal Service and Intercarrier Compensation reform. The Plan provides for a reasonable alternative to the Intercarrier Compensation (ICC) and Universal Service Fund (USF) reforms adopted by the Commission in its November 18, 2011 Order in the above-captioned dockets. As stated in the comprehensive SCC/Alexicon *Ex Parte Presentation* filed in the record on September 20th, 2012, the Plan provides the Commission with a predictable and equitable method for disbursing Connect America Fund (CAF), all of which fit within the constraints of the Commission's current funding budget.

If the Commission wishes to continue recognizing the substantial public and private resources that have already been invested in rural communications networks, and in doing so properly incent the continued provision and advancement of broadband services in rural areas, the SCC/Alexicon Plan should be given serious consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas K. Kitch", with a stylized flourish at the end.

Douglas K. Kitch, CPA
President, Alexicon Telecommunications Consulting